

Exhibit A

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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA
MAPLEY,

Plaintiffs,

vs.

WATCHTOWER BIBLE AND TRACT
SOCIETY OF NEW YORK, INC., and
WATCH TOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA.,

Defendants,

Case No. CV-20-52-BLG-SPW

**AFFIDAVIT OF
JAMES C. MURNION**

ARIANE ROWLAND, and JAMIE)	
SCHULZE)	Cause No. CV 20-59-BLG-SPW
Plaintiff,)	
vs.)	
)	
WATCHTOWER BIBLE AND TRACT)	
SOCIETY OF NEW YORK, INC., and)	
WATCH TOWER BIBLE AND TRACT)	
SOCIETY OF PENNSYLVANIA,)	
)	
Defendants.)	
)	

Pursuant to this Court's Orders (ECF No. 318 in CV 20-52-BLG-SPW; ECF No. 253 in CV-20-59-BLG-SPW-TJC) I, James C. Murnion, an attorney duly admitted to practice law in this Court, submits the following Affidavit and supporting documents of expenses, and attorney's fees "for their work finding the attached exhibits not disclosed to them in discovery" and "preparing the instant motion [referring to ECF No. 287 in CV 20-52-BLG-SPW; ECF No. 240 in CV-20-59-BLG-SPW-TJC (hereinafter "Plaintiffs' Motion")"]".

1. I am an Associate at the law firm of Meyer, Shaffer & Stepan, PLLP and represent Plaintiffs in this matter.

2. Costs and expenses related to Plaintiffs' Motion were tracked contemporaneously, and where receipts are available, they have been provided in the separate Declaration of Patti L. Gruwell.

3. Attorney and paralegal time expenditures were not kept contemporaneously because Plaintiffs are not being billed by the hour. Nevertheless, sufficient records and documentation existed to provide a basis for reasonable estimates of some of the time spent finding exhibits and preparing Plaintiffs' Motion. Much of the actual time spent is not reflected in records or documentation, and therefore Plaintiffs are not requesting fees for this time.

4. Regarding the finding of exhibits from other cases, this project began in 2022 when Plaintiffs fully appreciated that, for whatever reason, Defendants and their representatives were more than willing to openly discuss certain issues in prior cases that they were unwilling to be forthcoming about in this case. Plaintiffs accordingly endeavored to find documents from prior cases in which one or both Defendants discussed the issues in Plaintiffs' Motion, among others. This work began with locating cases involving one or both Defendants around the country. Paralegal Jessica Yuhas then reviewed the docket reports for each case for documents that could contain information about issues in this case, including the ones presented in Plaintiffs' Motion. Each document was then placed on a document tracking spreadsheet for attorney review.

5. Next, Plaintiffs' counsel reviewed documents. While some of this work was contemporaneously documented in the tracking spreadsheet, much of it

was not, nor does Plaintiffs' counsel have any objective way to recreate the time spent reviewing such documents. As such, Plaintiffs are not claiming fees for work they cannot tether to the tracking spreadsheet.

6. For work they can tether to the tracking spreadsheet, Plaintiffs are merely claiming one minute of attorney time per page of document reviewed. The spreadsheet reflects that I reviewed 3,241 pages of documents and Associate Katy Gannon reviewed 1,311 pages of documents for a total of 4,552 pages reviewed by associate attorneys, estimated at 75.86 hours spent. Partner Ryan Shaffer reviewed 987 Pages of documents and Partner Rob Stepan reviewed 2,287 pages for a total of 3,274 pages reviewed by partners, estimated at 54.56 hours spent. Excerpts from the spreadsheet are attached hereto as **Exhibit 1**. Partner time is ordinarily and customarily billed at \$300 per hour in cases we bill by the hour. Associate time is ordinarily and customarily billed at \$200 per hour in cases we bill by the hour. As such, the fees for attorney time spent reviewing documents is \$31,543 total. This is a gross underestimation of the actual time spent, but without objective indicators of the actual time spent, Plaintiffs are not comfortable claiming anything more.

7. Regarding the preparation of Plaintiffs' Motion, this work was primarily conducted by me and Mr. Shaffer. Our time spent was not

contemporaneously tracked. However, based on my six (6) years of experience litigating contested civil matters, I know that one page of well-researched and well-edited briefing typically requires one hour of work, and therefore the sixteen (16) pages of substantive content in Plaintiffs' opening brief and thirteen (13) pages of substantive content in Plaintiffs' reply brief would take twenty-nine (29) hours of attorney time. Again, since this time was not contemporaneously tracked, I cannot say with precision how much time I spent versus how much time Mr. Shaffer spent briefing Plaintiffs' Motion. However, Mr. Shaffer and I reasonably believe the time was approximately fifty percent each and therefore request fourteen and a half (14.5) hours of partner time and fourteen and a half (14.5) hours of associate time for a total of \$7,250.00.

8. Based upon the foregoing and the documents supporting this Affidavit, I affirm and certify that the amount now being claimed is a very conservative reflection of the actual time and expense spent finding documents pertinent to Plaintiffs' Motion and preparing the motion.

DATED this 7th day of March, 2024.

By: 

James C. Murnion

MEYER, SHAFFER & STEPANS PLLP

Attorneys for Plaintiffs

Affidavit of James C. Murnion

Caekaert and Mapley v. Watchtower Bible Tract of New York, Inc., et. al.

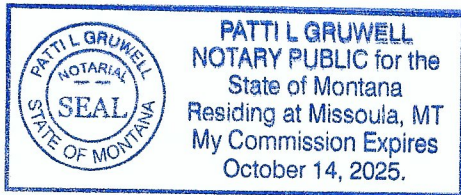
Rowland and Schulze v. Watchtower Bible Tract of New York, Inc., et. al.

State of Montana

County of Missoula

This instrument was signed and sworn to before me on March 7th, 2024

by James C. Murnion.



Patti L. Gruwell
(Notary Signature)

Patti L. Gruwell
Print Name of Notary Public
Notary Public for the State of MT
Residing at: Missoula, MT
My Commission Expires: 10/14/25

Affidavit of James C. Murnion

Caekaert and Mapley v. Watchtower Bible Tract of New York, Inc., et. al.
Rowland and Schulze v. Watchtower Bible Tract of New York, Inc., et. al.

Exhibit 1

STATE	COURT INFO	CASE NO.	PARTIES	DOCUMENT DATE	DOCUMENT DESCRIPTION	PAGE COUNT	RVW ATTORNEY
MT	MT Supreme Court	DA 19-0077	Nunez (PL)	5/22/2019	Appellants' Opening Brief	69	JAMES
MT	MT Supreme Court	DA 19-0077	Nunez (PL)	8/14/2019	Appellants' Reply Brief	35	JAMES
MT	MT Supreme Court	DA 19-0077	Nunez (PL)	1/8/2020	Synopsis of the Case	2	JAMES
MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	9/24/2018	Trial Transcripts - Afternoon Session	426	JAMES
MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	8/11/2021	Hearing Transcript - Hearing to Show Cause	46	JAMES
MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	4/23/2018	Motion for Protective Order by WTNy and CCJW Regarding Requests for Production and Brief in Support (Doc. 35)	25	JAMES
MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	4/23/2018	Motion for Protective Order by WTNy and CCJW Regarding Deposition Topics and Brief in Support (Doc. 38)	14	JAMES
MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	5/18/2018	WTNY & CCJW's Reply in Support of Motion for Protective Order Regarding Requests for Production (Doc. 55)	9	JAMES
MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	6/8/2018	Religious Defendants' Opposition to PLs' Motion for Partial Summary Judgment and Cross-Motion for Partial Summary Judgment (Doc. 62)	23	JAMES
MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	6/26/2018	Defendants' Motion for Summary Judgment as to Claims Brought by Alex Nunez or, in Alternative, Motion for Summary Adjudication of Individual Claims and Supporting Brief (Doc. 67)	25	JAMES
MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	8/7/2018	Notice of Filing of Proposed Final Pretrial Order (Doc. 69)	32	JAMES
MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	8/7/2018	Reply Brief in Support of Motion for Summary Judgment of Claims Brought by Alex Nunez, or in Alternative, Motion for Summary Adjudication of Individual Claims (Doc. 95)	10	JAMES
MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	2/10/2020 Court Filing 1/26/2017	Affidavit of Danny Bland filed as an Exhibit to Doc. 151	38	JAMES
MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	5/4/2020	Defendants' Opposition to Motion for Leave to Proceed with Claim for Common Law Negligence (Doc. 173)	21	JAMES
MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	5/4/2020	Defendants' Response to PLs' Motion for Leave to File Second Amended Complaint and to Add WTPA (Doc. 174)	13	JAMES
MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	4/20/2021	PL's Motion to Compel and Brief in Support (Doc. 207)	112	JAMES
MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	5/11/2021	WTNY's Opposition to PL's Motion to Compel (Doc. 208)	23	JAMES
MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	5/28/2021	Order Compelling Production (Doc. 210)	11	JAMES
MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	6/23/2021	Order Compelling Production & for Sanctions (Doc. 214)	8	JAMES
MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	6/25/2021	Religious Defendants' Motion to Alter or Amend Order Compelling Production & for Sanctions and Brief in Support (Doc. 216)	5	JAMES
MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	6/25/2021	Fourteenth Foundational Affidavit of Tessa A. Keller (Doc. 217)	20	JAMES
MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	7/19/2021	Religious Defendants' Reply in Support of Motion to Alter or Amend Order Compelling Production & for Sanctions (Doc. 228)	10	JAMES
MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	7/29/2021	Order Warning of Sanction of Judgment on Liability for Continued Violation of Discovery Orders	2	JAMES

MT	Twentieth District Court - Sanders County	DV-16-84	Nunez (PL)	8/3/2021	Religious Defendants' Objections to PL's Second Notice of Non-Compliance (Doc. 239)	14	JAMES
WA	Spokane County Superior Court	04-2-02451-4	Vigue (PL)	1/27/2005	Defendant WTPA's Motion to Dismiss for Lack of PJ (Doc. 27)	3	JAMES
WA	Spokane County Superior Court	04-2-02451-4	Vigue (PL)	1/27/2005	Defendant WTPA's Memorandum in Support of Motion to Dismiss for Lack of PJ (Doc. 28)	12	JAMES
WA	Spokane County Superior Court	04-2-02451-4	Vigue (PL)	1/27/2005	Affidavit of Alexander W. Reinmueller (Doc. 29)	6	JAMES
WA	Spokane County Superior Court	04-2-02451-4	Vigue (PL)	1/31/2005	Church Defendants' Disclosure of Lay and Expert Witnesses (Doc. 31)	5	JAMES
WA	Spokane County Superior Court	04-2-02451-4	Vigue (PL)	2/1/2005	Rustad's List of Defendant's Witnesses (Doc. 32)	1	JAMES
WA	Spokane County Superior Court	04-2-02451-4	Vigue (PL)	10/28/2005	Affidavit of Alexander W. Reinmueller (Doc. 59)	5	JAMES
WA	Spokane County Superior Court	04-2-02451-4	Vigue (PL)	10/28/2005	Affidavit of Andrew Mitchell re WTPA's Motion to Dismiss for Lack of PJ (Doc. 61)	9	JAMES
WA	Spokane County Superior Court	04-2-02451-4	Vigue (PL)	10/28/2005	Affidavit of Gene Smalley re WTPA's Motion to Dismiss for Lack of PJ (Doc. 60)	4	JAMES
WA	Spokane County Superior Court	04-2-02451-4	Vigue (PL)	2/28/2007	Defendant's WTNy, WTPA, CCJS & Opportunity Congregation of JW's Memorandum of Law in Support of Motion for Summary Judgment (Doc. 86)	28	JAMES
WA	Spokane County Superior Court	04-2-02451-4	Vigue (PL)	2/28/2007	Declaration of Donald G. Sontre in Support of Church Defendants' Motion for Summary Judgment (Doc. 87)	51	JAMES
WA	Spokane County Superior Court	04-2-02451-4	Vigue (PL)	2/28/2007	Declaration of Kenneth Harding (Doc. 89)	6	JAMES
WA	Spokane County Superior Court	04-2-02451-4	Vigue (PL)	10/28/2005	WTPA's Supplemental Brief re Motion to Dismiss for Lack of PJ (Doc. 58)	27	JAMES
WA	Spokane County Superior Court	04-2-02451-4	Vigue (PL)	2/28/2007	Declaration of Gary N. Breaux (Doc. 88)	5	JAMES
CA	San Diego Superior Court	37-2010-00092450-CU-PO-CTL	Dorman & Gamboa (PL)	5/6/2011	WTNY's Memorandum of Points and Authorities in Opposition to PLs' Notice of Motion and Motion to Compel Further Documents from Defendant (Doc. 49)	45	JAMES
CA	San Diego Superior Court	37-2010-00092450-CU-PO-CTL	Dorman & Gamboa (PL)	5/13/2011	Notice of Lodgment in Support of PL's Motion to Compel Further Documents from Defendants	74	JAMES
CA	San Diego Superior Court	37-2010-00092450-CU-PO-CTL	Dorman & Gamboa (PL)	9/26/2011	Defendant Watchtower's Notice of Motion and Motion for Summary Judgment or in the Alternative Summary Adjudication (Doc. 110)	190	JAMES
CA	San Diego Superior Court	37-2010-00092450-CU-PO-CTL	Dorman & Gamboa (PL)	9/26/2011	Defendant Doe I, La Jolla Church's Notice of Motion and Motion for Summary Judgment or in the Alternative Summary Adjudication (Doc. 111)	126	JAMES
CA	San Diego Superior Court	37-2010-00092450-CU-PO-CTL	Dorman & Gamboa (PL)	10/4/2011	Linda Vista's Notice of Motion and Motion for Summary Judgment on the Second Amended Complaint or, in the Alternative Summary Adjudication of Issues (Doc. 115)	166	JAMES
CA	San Diego Superior Court	37-2010-00092450-CU-PO-CTL	Dorman & Gamboa (PL)	11/17/2011	Linda Vista Spanish Congregation's Opposition to PLs' Motion to Amend Complaint to Allege Punitive Damages (Doc. 133)	16	JAMES
CA	San Diego Superior Court	37-2010-00092450-CU-PO-CTL	Dorman & Gamboa (PL)	11/17/2011	Defendant WTNy's Memorandum of Points and Authorities in Opposition to PLs' Motion to Allege Punitive Damages (Doc. 131)	21	JAMES
CA	San Diego Superior Court	37-2010-00092450-CU-PO-CTL	Dorman & Gamboa (PL)	12/8/2011	Declaration of Mario F. Moreno in Support of Defendants WTNy's Lodgment of Exhibits in Support of Separate Statement of Facts in Reply to PLs' Opposition to Defendant's Motions for Summary Judgment	2	JAMES
CA	San Diego Superior Court	37-2010-00092450-CU-PO-CTL	Dorman & Gamboa (PL)	12/8/2011	Defendant WTNy's Lodgment of Exhibits in Support of Separate Statement of Facts in Reply to PLs' Opposition to Defendants' Motions for Summary Judgment (Doc. 159)	21	JAMES

CA	San Diego Superior Court	37-2010-00092450-CU-PO-CTL	Dorman & Gamboa (PL)	12/9/2011	Linda Vista Spanish Congregation's Opposition to PLs' Separate Statement of Undisputed Material Facts (Doc. 158)	24	JAMES
CA	San Diego Superior Court	37-2010-00092450-CU-PO-CTL	Dorman & Gamboa (PL)	12/9/2011	Defendant WTNy's Memorandum of Points and Authorities in Reply to PLs' Opposition to Defendants' Motions for Summary Judgment (Doc. 159)	20	JAMES
CA	San Diego Superior Court	37-2010-00092450-CU-PO-CTL	Dorman & Gamboa (PL)	12/12/2011	Defendant WTNy & Playa Pacifica Spanish Congregation's Joint Memorandum of Points and Authorities in Opposition to PLs' Notice of Motion and Second Motion to Compel Further Documents from Defendant (Doc. 162)	14	JAMES
OR	Multnomah Circuit Court	14CV18423	Alston (PL)	3/9/2016	PLs' Motion to Compel Documents from Defendant Watchtower	5	JAMES
OR	Multnomah Circuit Court	14CV18424	Alston (PL)	3/9/2016	PLs' Memorandum in Support of Motion to Compel Documents from Defendant Watchtower	20	JAMES
OR	Multnomah Circuit Court	14CV18425	Alston (PL)	4/15/2016	Defendant WTNy's Memorandum in Opposition to PLs' Motion to Compel	36	JAMES
OR	Multnomah Circuit Court	14CV18426	Alston (PL)	4/15/2016	Declaration of Philip Van Der Weele in Opposition to PLs' Motion to Compel	27	JAMES
OR	Multnomah Circuit Court	14CV18427	Alston (PL)	4/15/2016	Declaration of Isaac Juarez in Opposition to PLs' Motion to Compel	7	JAMES
OR	Multnomah Circuit Court	14CV18428	Alston (PL)	4/15/2016	Declaration of Thomas Jefferson, Jr. in Opposition to PLs' Motion to Compel	14	JAMES
OR	Multnomah Circuit Court	14CV18429	Alston (PL)	5/31/2016	Defendant North Hillsboro Congregation of JW's Motion for Summary Judgment	10	JAMES
OR	Multnomah Circuit Court	14CV18430	Alston (PL)	5/31/2016	Declaration of Thomas V. Dulcich in Support of North Hillsboro Congregation of JW's Motion for Summary Judgment	24	JAMES
OR	Multnomah Circuit Court	14CV18431	Alston (PL)	5/31/2016	Declaration of Kim Hutchinson in Support of North Hillsboro Congregation of JW's Motion for Summary Judgment	3	JAMES
OR	Multnomah Circuit Court	14CV18432	Alston (PL)	6/20/2016	Declaration of Joel Taylor Authenticating Supplemental Authority in Response to New Authority Cited by Plaintiffs in their Reply Mem in Support of their Motion to Compel Documents from Defendant Watchtower	24	JAMES
OR	Multnomah Circuit Court	14CV18433	Alston (PL)	9/27/2016	Order on PLs' Motion to Compel	6	JAMES
OR	Multnomah Circuit Court	14CV18434	Alston (PL)	3/24/2017	Judgment	8	JAMES
CA	Orange County Superior Court	30-2014-00741722-CU-PO-CJC	Roe (PL)	8/25/2014	Doc. 2 Complaint	21	JAMES
CA	Orange County Superior Court	30-2014-00741722-CU-PO-CJC	Roe (PL)	8/31/2018	Doc. 857 Defendant Doe 1 Congregation's Memorandum of Points and Authorities in Support of MSJ Against Plaintiffs Rudy Padrol and Jose Montegudo, or in the Alternative Summary Adjudication	19	JAMES
CA	Orange County Superior Court	30-2014-00741722-CU-PO-CJC	Roe (PL)	8/9/2019	Doc. 1244 CA COA Order re Respondent's Motion to Dismiss Appeal, Request for Sanctions, and Request for Judicial Notice.	1	JAMES
CA	Orange County Superior Court	30-2014-00741722-CU-PO-CJC	Roe (PL)	10/3/2019	Doc. 1254 Notice of Ruling on Defendant Doe 2 Supervisory Organization's Motions Compelling PLs to Serve Supplemental Responses and Responsive Documents re Requests for Production	7	JAMES
CA	Orange County Superior Court	30-2014-00741722-CU-PO-CJC	Roe (PL)	6/29/2020	Doc. 1259 CA COA Opinion - Dismissal Denied and Sanctions Granted	26	JAMES
CA	Orange County Superior Court	30-2014-00741722-CU-PO-CJC	Roe (PL)	7/29/2020	Doc. 1260 CA COA - Order Denying Request for Rehearing	2	JAMES
CA	Orange County Superior Court	30-2014-00741722-CU-PO-CJC	Roe (PL)	8/31/2020	Doc. 1261 CA COA - Remittitur	27	JAMES
CA	Orange County Superior Court	30-2014-00741722-CU-PO-CJC	Roe (PL)	9/8/2020	Doc. 1263 PLs' Request for Dismissal with Prejudice - Doe 3, Perpetrator Only	5	JAMES
CA	Orange County Superior Court	30-2014-00741722-CU-PO-CJC	Roe (PL)	9/8/2020	Doc. 1264 PLs' Request for Dismissal with Prejudice - Doe 3, Perpetrator Only	5	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	9/11/2003	Defendants' Notice of Motion to Quash Service of Summons Based on Lack of Personal Jurisdiction	3	JAMES

CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	9/11/2003	Memorandum of Points & Authorities in Support of Motion to Quash Service of Summons	12	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	9/11/2003	Appendix of Non-California Authorities in Support of Defendants' Motion to Quash Service of Summons <i>Helicopteros Nacionales De Colombia v. Hall</i> <i>Bancorft & Masters, Inc. v Augusta National Inc</i>	29	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	9/18/2003	Defendants' Notice of Demurrers to PLs' Complaint	4	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	9/18/2003	Memorandum of Points & Authorities in Support of Church Defendants' Demurrers	30	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	9/18/2003	Appendix of Non-California Authorities in Support of Defendants' Demurrers <i>Amato v. Greenquist</i> <i>Ehrens v. Lutheran Church-Missouri Synod</i> <i>Franco v. Church of Jesus Christ of Latter-Day Saints</i> <i>H.R.B. v. J.L.G</i> <i>Langford v. Roman Catholic Diocese of Brooklyn</i> <i>Schieffer v. Catholic Archdiocese of Omaha</i> 18 C.J.S Corporations § 12 (2003) 86 C.J.S. Torts § 38 (1997)	88	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	10/31/2003	Church Defendants' Reply Memorandum of Points and Authorities in Support of Demurrers	8	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	10/31/2003	Moving Church Defendants' Reply in Support of Motion to Quash Service of Summons	8	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	1/14/2004	Defendants' Notice of Demurrers to PLs' Amended Complaint	3	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	1/14/2004	Memorandum of Points & Authorities in Support of Church Defendants' Demurrers Against Amended Complaint	15	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	2/2/2004	Supplemental Memorandum of Points & Authorities in Support of Motion to Quash Service of Summons	20	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	2/2/2004	Second Affidavit of Richard E. Abrahamson	4	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	2/2/2004	Supplemental Memorandum of Points & Authorities in Support of Motion to Quash Service of Summons Appendix of Non-California Authorities <i>Asahi Metal Industry Company v. Superior Court</i> <i>Bancroft & Masters, Inc. v. Augusta National Inc.</i> Burger King Corp. v. Rudzewicz Gate Learjet Corp. v. Jensen Helicopteros Nacionales De Colombia v. Hall Internat. Shoe Co. v. Washington Perkins v. Benguet Consol. Mining Co. Shute v. Carnival Cruise Lines Thos. P. Gonzalez Corp. v. Consejo Nacional de Produccion de Costa Rica	117	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	2/13/2004	Church Defendants' Reply in Support of Demurrers to PLs' Amended Complaint	7	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	11/29/2004	Church Defendants' Brief re Extent of Coordination	9	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	11/29/2004	Defendants' Joint Statement re Extent of Coordination	11	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	12/2/2004	Church Defendants' Reply re Extent of Coordination	6	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	2/1/2005	Memorandum of Points & Authorities in Support of Church Defendants' Demurrers in All Coordinated Cases	17	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	2/1/2005	Notice of Church Defendants' Motions to Strike Portions of PLs' Complaints in the Coordinated Cases	24	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	2/1/2005	Memorandum of Points & Authorities in Support of Church Defendants' Motions to Strike Portions of Complaints in Coordinated Cases	15	JAMES

CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	2/1/2005	Defendants' Notice of Demurrers in Coordinated Cases	5	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	3/14/2005	WTPA's Response in Opposition to Motion to Compel Discovery	10	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	3/14/2005	Defendants' Opposition to PLs' Separate Statement in Support of Motion to Compel WTPA's Responses to Form Interrogatories	6	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	3/14/2005	Defendants' Opposition to PLs' Separate Statement in Support of Motion to Compel WTPA's Responses to Special Interrogatories, Set One	44	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	3/14/2005	Defendants' Opposition to PLs' Separate Statement in Support of Motion to Compel WTPA's Responses to PMK Deposition Areas of Inquiry	21	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	3/14/2005	Dec. of Robert J. Schnack in Support of WTPA's Response in Opposition to Motion to Compel Discovery	193	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	3/14/2005	Defendants' Opposition to PLs' Separate Statement of in Support of Motion to Compel WTPA's Responses to RFPs, Set One	26	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	3/14/2005	Defendants' Opposition to PLs' Separate Statement in Support of Motion to Compel WTPA's Responses to Document Requests Contained in Fourth Amended Deposition Notice of PMK	10	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	5/5/2005	Defendant CCJW's Notice of Motions for Summary Judgment and Alternative Motions for Summary Adjudication in all Coordinated Cases	4	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	5/5/2005	Defendant CCJW's Memorandum of Points & Authorities in Support of Motions for Summary Judgment and Alternative Motions for Summary Adjudication in all Coordinated Cases	9	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	5/5/2005	Defendants CCJW's Separate Statement of Undisputed Facts in Support of Motions for Summary Judgment and Alternative Motions for Summary Adjudication in all Coordinated Cases	5	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	5/5/2005	Affidavit of William H. Nonkes in Support of Defendant CCJW's Motions for Summary Judgment	5	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	8/30/2005	Defendants' Objections to PLs' Reply Brief and Corresponding Motions to Strike	15	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	9/30/2005	Church Defendants' Notice of Motion for Protective Order Regarding the Deposition Notice for J.R. Brown	4	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	9/30/2005	Memorandum of Points & Authorities in Support of Motion for Protective Order Regarding the Notice of Deposition re J.R. Brown	10	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	9/30/2005	Dec. of Robert J. Schnack in Support of Motion for Protective Order Regarding the Deposition Notice of J.R. Brown	18	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	9/30/2005	Dec. of J.R. Brown in Support of Motion for Protective Order Regarding the Deposition Notice for J.R. Brown	4	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	10/18/2005	Reply to Opposition to Defendants' Motion for Protective Order Regarding the Notice of Deposition re J.R. Brown	8	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	10/19/2005	Dec. of Robert J. Schnack in Support of Motion to Stay Execution of Order to Produce Documents Pending Writ	4	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	10/19/2005	Memorandum of Points & Authorities in Support of Church Defendants' Motion to Stay Execution of Order to Produced Documents Pending Writ	7	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	10/19/2005	Declaration of Mario F. Moreno	10	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	6/7/2006	Church Defendants' Response to PL's Motion to Set Trial Dates	11	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	6/7/2006	Dec of Robert J. Schnack in Support of Church Defendants' Response to PL's Motion to Set Trial Dates	6	JAMES
CA	CA COA	A114329	Charissa W & Nicole D (PL)	6/28/2006	Petition for Writ of Mandate, Verification of Robert J. Schnack, and Memorandum of Points & Authorities	30	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	9/15/2006	Notice of Motion and Motion to Compel PMK Deposition and Document Request Regarding the Legal Department	2	JAMES

CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	9/15/2006	Memorandum of Points & Authorities in Support of Motion to Compel PMK Deposition and Document Request Regarding the Legal Department	21	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	9/29/2006	Dec. of Robert J. Schnack in Support of Opposition to PLs' Motion to Compel Deposition PMK Deposition and Document Request Regarding the Watchtower Legal Department	5	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	9/29/2006	Church Defendants' Memorandum of Points & Authorities in Opposition to PLs' Motion to Compel Deposition and/or Motion for a Protective Order Regarding the Woodland Elders	17	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	9/29/2006	Dec. of J. Gary Hayes in Support of Defendants' Opposition to PLs' Motion to Compel Deposition and/or Motion for Protective Order Regarding the Woodland Elders	6	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	9/29/2006	Dec. of Arturo Almanza in Support of Defendants' Opposition to PLs' Motion to Compel Deposition and/or Motion for Protective Order Regarding the Woodland Elder	6	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	9/29/2006	Church Defendants' Memorandum of Points & Authorities in Opposition to PLs' Motion to Compel Deposition PMK Deposition and Document Request Regarding General Discovery Matters	39	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	9/29/2006	Church Defendants' Memorandum of Points & Authorities in Opposition to PLs' Motion to Compel Deposition PMK Deposition and Document Request Regarding the Watchtower Legal Department	9	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	9/29/2006	Dec. of Mario F. Moreno in Support of Opposition to PLs' Motion to Compel Deposition PMK Deposition and Document Request Regarding the Watchtower Legal Department	30	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	10/16/2006	Court's Ruling on Discovery Motions	3	JAMES
CA	Napa County Superior Court	26-22191	Charissa W & Nicole D (PL)	11/21/2006	Church Defendants' Response in Opposition to Coordinate and "Add On" Case	20	JAMES
CA	Riverside Superior Court	MCC 1300850	J.W. (PL)	2/9/2015	Notice of Filing Ruling re: Plaintiff's Motion for Sanctions Against all Defendants	7	JAMES
				2/11/1986	Affidavit of Don Adams	10	JAMES
					TOTAL: 3,241		

STATE	COURT INFO	CASE NO.	PARTIES	DOCUMENT DATE	DOCUMENT DESCRIPTION	PAGE COUNT	RVW ATTORNEY
TX	251st District Court - Potter County	91,048-C-1	Amy B. (PL)	1/30/2004	WTNY, et. al.'s Motion for Summary Judgment with Exhibits: Affidavits of Larry Kelley, Chuck Regal, Christopher Jensen PL's Original Petition Documents: Kell 171, 175, 181 & 189 Amy B. Depo. Excerpts	74	KATY
TX	251st District Court - Potter County	91,048-C-1	Amy B. (PL)	1/30/2004	WTNY, et. al.'s Brief in Supp. Motion for Summary Judgment	21	KATY
TX	251st District Court - Potter County	91,048-C-1	Amy B. (PL)	3/17/2004	WTNY, et. al.'s Objections to PL's Summary Judgment Evidence	55	KATY
TX	251st District Court - Potter County	91,048-C-1	Amy B. (PL)	3/17/2004	WTNY, et. al.'s Reply in Support of their MSJ Affidavits of Merton Campbell & Charles Regal	29	KATY
OR	Marion County Circuit Court	06-C-15281	Grafmyer	10/11/2006	DFs' Memo in Opposition to Motion to Compel Docs	5	KATY
OR	Marion County Circuit Court	06-C-15281	Grafmyer	10/25/2006	DFs' Supp. Memo in Opposition to Motion to Compel Docs	24	KATY
OR	Marion County Circuit Court	06-C-15281	Grafmyer	10/27/2006	PL's Response to DFs' Supp. Memo in Opposition to Motion to Compel Documents	17	KATY
OR	Marion County Circuit Court	06-C-15281	Grafmyer	11/7/2006	DFs' 3rd Memo in Opposition to Motion to Compel Document	8	KATY
OR	Marion County Circuit Court	06-C-15281	Grafmyer	11/14/2006	Supp. Dec. of Merton V. Campbell (Elder)	3	KATY
OR	Marion County Circuit Court	06-C-15281	Grafmyer	3/9/2004	Excerpts from Deposition Transcript - James Walter Whitney WTNY001151-001338	187	KATY
TX	Polk County District Court Smith County District Court	CIV2600 03-2368C/B	Kaleena S.	11/18/2003	Deposition Transcript - Curtis Hall	23	KATY
TX	Polk County District Court Smith County District Court	CIV2600 03-2368C/B	Kaleena S.	12/18/2003	DFs' Joint Motion for Partial Summary Judgment as to all Individual Claims and Causes of Action of Plaintiff, Kaleena S.	11	KATY
TX	Polk County District Court Smith County District Court	CIV2600 03-2368C/B	Kaleena S.	2/4/2004	PL's Omnibus Motion to Compel	16	KATY
TX	Polk County District Court Smith County District Court	CIV2600 03-2368C/B	Kaleena S.	2/10/2004	PL's Supplemental Omnibus Motion to Compel	6	KATY
TX	Polk County District Court Smith County District Court	CIV2600 03-2368C/B	Kaleena S.	3/17/2004	Hearing Transcript - Motion for Summary Judgment	15	KATY
TX	Polk County District Court Smith County District Court	CIV2600 03-2368C/B	Kaleena S.	6/18/2004	Order Granting Motion to Compel	1	KATY
OR	County of Linn District Court	03-0431	Morley, Schroeder & Vizenor (PL)	3/18/1999	Deposition Transcript Excerpts - Edward Burke (former Elder)	6	KATY

OR	County of Linn District Court	03-0431	Morley, Schroeder & Vizenor (PL)	5/21/2003	DFs' Motions to Dismiss & Supporting MOL EX: Supreme Court of Main Decision - Bryan R. v. WTNY	36	KATY
OR	County of Linn District Court	03-0431	Morley, Schroeder & Vizenor (PL)	7/9/2003	DFs' Reply re Motions to Dismiss	34	KATY
OR	County of Linn District Court	03-0431	Morley, Schroeder & Vizenor (PL)	9/26/2005	DF's Motion for Partial Summary Judgment Dec. of Alexander Reinmueller Dec. of Patrick J. LaFranca Dec. or William Nonkes	9	KATY
OR	County of Linn District Court	03-0431	Morley, Schroeder & Vizenor (PL)	4/5/2006	DF's Motion for Summary Judgment Dec. of John Kaempf with Excerpts for PL's 11/30/2005 Depo. Transcript	20	KATY
OR	County of Linn District Court	03-0431	Morley, Schroeder & Vizenor (PL)	Undated	Letter from WTNY to BOE regarding the deletion of an elder	2	KATY
CA	COA -4th District	D070723	Padron (PL)	3/15/2017	Appellant's Opening Brief	62	KATY
CA	COA - 4th District - Div. 1	D070723	Padron (PL)	7/18/2017	Respondent's Opening Brief	77	KATY
CA	COA - 4th District - Div. 1	D070723	Padron (PL)	8/21/2017	Appellant's Reply Brief	31	KATY
CA	COA - 4th District - Div. 1	D070723	Padron (PL)	11/9/2017	COA Opinion	39	KATY
WA	USDC - Eastern District	CV-11-00623	LLS America	9/17/2013	PL's MIL No. 15 to Admit Evidence of Transfers made by Debtor prior to 7/15/2005 and Memo in Support (Doc. 10)	472	KATY
WA	USDC - Eastern District	CV-11-00623	LLS America	10/18/2013	Response to PL's MIL No. 15 (Doc. 12)	6	KATY
WA	USDC - Eastern District	CV-11-00623	LLS America	11/1/2012	PL's Local Rule 56.1(c) Statement (Doc. 17)	8	KATY
WA	USDC - Eastern District	CV-11-00623	LLS America	11/1/2013	Dec. of Richard L. Mount in Support of Reply to PL's MIL No. 15 (Doc. 18)	14	KATY
						TOTAL: 1,311	

STATE	COURT INFO	CASE NO.	PARTIES	DOCUMENT DATE	DOCUMENT DESCRIPTION	PAGE COUNT	RVW ATTORNEY
PA	Philadelphia County Court of Common Pleas	13-09-01293	Fessler	2/7/2017	Trial Transcript - Day 1 - P.M. Session Opening Statements Thomas Jefferson Testimony	131	RYAN
PA	Philadelphia County Court of Common Pleas	13-09-01293	Fessler	2/8/2017	Trial Transcript - Day 2 - A.M. Session Thomas Jefferson Testimony	131	RYAN
PA	Philadelphia County Court of Common Pleas	13-09-01293	Fessler	2/9/2017	Trial Transcript - Day II - P.M. Session Eric Hoffman Testimony Donald Hollingworth Testimony	115	RYAN
PA	Philadelphia County Court of Common Pleas	13-09-01293	Fessler	2/10/2017	Trial Transcript - Day 3 - A.M. Session T. Monheim Testimony L. Layden Testimony	140	RYAN
PA	Philadelphia County Court of Common Pleas	13-09-01293	Fessler	2/13/2017	Trial Transcript - Day 4 - A.M. Session L. Layden Testimony	107	RYAN
IL	McHenry County Twenty-Second Circuit Court	20 CM 1338	Penkava (DF)	12/16/2021	Hearing Transcript - Excerpt of Pretrial Proceedings	143	RYAN
IL	McHenry County Twenty-Second Circuit Court	20 CM 1338	Penkava (DF)	12/16/2021	Hearing Transcript - Pretrial Testimony of John Miller & Eloina Hernandez	143	RYAN
IL	McHenry County Twenty-Second Circuit Court	20 CM 1338	Penkava (DF)	12/17/2021	Hearing Transcript - Closing Arguments	41	RYAN
IL	McHenry County Twenty-Second Circuit Court	20 CM 1338	Penkava (DF)	12/23/2021	Court's Ruling on Motions and Testimoy	36	RYAN
Various	Various	Various	Various	Various	Affidavits of Moreno, Brumley, & Polidoro in Support of WTPA's copyright infringement cases		RYAN
						TOTAL: 987	

STATE	COURT INFO	CASE NO.	PARTIES	DOCUMENT DATE	DOCUMENT DESCRIPTION	PAGE COUNT	RVW ATTORNEY
CA	Alameda County Superior	HG115588324	Conti	3/28/2011	MOA in Supp. of Church DFs' Demurrer to PL's Complaint	8	ROB
CA	Alameda County Superior Court	HG115588324	Conti	7/19/2011	Meet & Confer Dec. of Simons in Supp. of PL's Motion to Compel Documents	49	ROB
CA	Alameda County Superior	HG115588324	Conti	7/19/2011	MOA in Supp. of PL's Motion to Compel Documents	5	ROB
CA	Alameda County Superior	HG115588324	Conti	8/16/2011	PL's Reply in Support of Motion to Compel Documents	5	ROB
CA	Alameda County Superior Court	HG115588324	Conti	8/17/2011	WTNY, et. al's MOA in Opposition to Motion to Compel Further Production of Documents	35	ROB
CA	Alameda County Superior Court	HG115588324	Conti	8/17/2011	Foreign Cases Filed in Support of WTNY, et. al's MOA in Opposition to PL's Motion to Compel Documents	160	ROB
CA	Alameda County Superior Court	HG115588324	Conti	9/7/2011	PL's Motion, MOA and Dec. of Simons re Motion to Compel Answer to Deposition Answers from Abrahamson	6	ROB
CA	Alameda County Superior Court	HG115588324	Conti	9/7/2011	Dec. of Simons in Support of PL's Motion to Compel Deposition Answers from Gary Abrahamson	40	ROB
CA	Alameda County Superior Court	HG115588324	Conti	9/16/2011	WTNY, et. al's MOA in Opposition to Motion to Compel Deposition Answers from Abrahamson.	33	ROB
CA	Alameda County Superior Court	HG115588324	Conti	9/20/2011	Order Granting Motion to Compel Deposition Answers from Abrahamson	2	ROB
CA	Alameda County Superior	HG115588324	Conti	10/17/2011	Order Granting Motion to Compel Documents	2	ROB
CA	Alameda County Superior Court	HG115588324	Conti	5/3/2012	Order and Minutes from 5/3/2012 Hearing re PL's Motion to Amend Complaint	2	ROB
CA	Alameda County Superior Court	HG115588324	Conti	5/9/2012	Jury Trial Transcript-Day 1 Opening Statements Gary Abrahamson Testimony Michael Clarke Testimony	226	ROB
CA	Alameda County Superior Court	HG115588324	Conti	5/30/2012	Jury Trial Transcript-Day 2 Michael Clark Testimony Continued Evelyn Kendrick Testimony Claudia Francis Testimony Andrea Sylvia Testimony Kathleen Conti Testimony Dorothy Conti Testimony Clifford Williams Testimony Lawrence Lamerdin Testimony	209	ROB
CA	Alameda County Superior Court	HG115588324	Conti	5/31/2012	Jury Trial Transcript-Day 3 Car Lewis Testimony Neal Conti Testimony Allen Shuster Testimony Laura Walton, M.D. Testimony Laura Fraser, M.D. Testimony	221	ROB
CA	Alameda County Superior Court	HG115588324	Conti	6/4/2012	Jury Trial Transcript-Day 4 Robert Davila Testimony Carolyn Martinez Testimony Anna Salter, PhD Testimony Candace Conti Testimony	169	ROB
CA	Alameda County Superior Court	HG115588324	Conti	6/5/2012	Jury Trial Transcript-Day 5 Elizabeth Ponton, M.D. Testimony Bernice Munoz Testimony Sylvia Munoz Testimony Monica Applewhite, PhD Testimony Allen Shuster Testimony	192	ROB
CA	Alameda County Superior	HG115588324	Conti	6/6/2012	Jury Trial Transcript - Day 6	72	ROB
CA	Alameda County Superior Court	HG115588324	Conti	6/11/2012	Jury Trial Transcript - Day 7 Closing Arguments	224	ROB
CA	Alameda County Superior	HG115588324	Conti	2/15/2012	Depo. of Mario F. Moreno	10	ROB
CA	San Diego Superior Court	37-2012-00099849-CU-PO-CTL	Lopez (PL)	3/30/2017	Dec. of Storey in Support of Pl's Opposition to WTNY's Motion for Summary Judgment or Alternative Summary Adjudication Issues (Doc. 513)	220	ROB
CA	San Diego Superior Court	37-2012-00099849-CU-PO-CTL	Lopez (PL)	3/31/2014	Deposition Transcript - Richard Ashe (Vol. I) CAEKAERT/MAPLEY 003642-003864	223	ROB

CA	San Diego Superior Court	37-2012-00099849-CU-PO-CTL	Lopez (PL)	4/1/2014	Deposition Transcript - Richard Ashe (Vol. II) CAEKAERT/MAPLEY 003865-004017	153	ROB
CA	San Diego Superior Court	37-2012-00099849-CU-PO-CTL	Lopez (PL)	4/1/2014	Deposition Transcript - Mario F. Moreno	21	ROB
						<u>TOTAL: 2,287</u>	